

**Addendum to the Mitigated Negative Declaration
for the Carquinez Middle School Replacement Project
State Clearinghouse Number: 2018072003**

1. INTRODUCTION:

Pursuant to the provisions of the California Environmental Quality Act (CEQA), on September 20, 2018, the John Swett Unified School District (JSUSD) circulated for public review and comments a draft Initial Study / Mitigated Negative Declaration (ISMND) for the approval of the Carquinez Middle School Replacement Project (Project). The ISMND evaluated the impacts of replacing the existing Carquinez Middle School with a new school building that would be constructed on the same site to address seismic safety issues. Carquinez Middle School is located on a 8-acre site (Site) which is located in the community of Crockett which is an unincorporated area of Contra Costa County.

During the site investigation, the potential for soil contamination was identified at the Site. The ISMND concluded that the proposed project would be required to comply existing regulations for school site evaluation and cleanup under Department of Toxic Substances Control (DTSC) oversight. Further, the ISMND concluded these regulations would ensure that the proposed project would result in a less-than-significant impact related to the potential release of hazardous materials that could be present in the subsurface of the Site. The District circulated the ISMND for public review from July 6, 2018 to August 20, 2018, and then revised the ISMND on August 8, 2018 and extended the comment period to September 8, 2018. The ISMND determined that the project could have potentially significant impacts specific to historic architectural resources. For this reason, the District prepared a Focused EIR that analyzed historic architectural resources alone. Mitigation measures for other environmental topics were also identified for the project in the ISMND.

In accordance to CEQA Guidelines [Cal. Code Regs., Title 14, §15164 and §15162], DTSC is amending the ISMND to incorporate the recommended remedy selection from the Removal Action Workplan (RAW). This Addendum to the previously adopted ISMND has been prepared to address activities associated with soil extraction and off-site disposal of lead contaminated soil.

During the initial site investigation, a Phase I Environmental Site Assessment (ESA) for the site was completed and submitted to the JSUSD in May 2018. The Phase I ESA identified recognized environmental conditions (RECs) based on known asbestos containing materials (ACM) and lead-based paint (LBP), potential termiticide application, a pole-mounted transformer, and an off-site service station. Soil samples collected and analyzed during a Limited Site Investigation (LSI) in early 2019 and a Preliminary Endangerment Assessment (PEA) in August 2019, revealed elevated concentrations of lead adjacent to and potentially underlying the eastern portion of the Band Building. Based on the LSI and the PEA analytical results, lead is the only chemical of concern (COC) that needs to be addressed at the Site. The source of the lead is likely due to historical use of lead-based paint on structures. The lead was detected in soil north of the main school building and near the eastern portion of the band building.

On September 5, 2019 the JSUSD entered into a School Cleanup Agreement (SCA) with the California Department of Toxic Substances Control (DTSC) to begin remediation activities for site preparation of the Project (HAS-FY19/20-017). As part of its obligations under the SCA, the JSUSD and its contractor Terracon prepared a RAW for the final remedy selection and alternative analysis under DTSC's discretionary approval authority. The RAW was prepared to address the elevated levels of lead found by the ESA, LSI, and PEA.

Pursuant to CEQA Guidelines [Cal. Code Regs., Title 14, §15164(c)], this Addendum is not being circulated for public review. A Notice of Determination will be filed with the State of California Office of Planning and Research, State Clearinghouse, upon project approval.

2. PROJECT DESCRIPTION:

In preparation for the construction of replacement school at the Site, DTSC is considering approval of a RAW in order to address the removal of lead from five excavation areas (see Figure 1). The excavated soil will be stored in roll-off bins at the Site, sampled, classified, profiled, manifested, and transported and disposed of appropriately as hazardous or non-hazardous waste. If disposal of hazardous soils is needed, those soils will be transported to a Class I landfill. If disposal of non-hazardous soils is needed, those soils may be transported to a Class II landfill or to a Class III landfill to be recycled for alternate daily cover.

3. PURPOSE OF ADDENDUM AND CEQA REQUIREMENTS:

The purpose of this Addendum is to update the project description provided in the ISMND to include the removal activities described in the RAW and to address the potential environmental effects of the activities described in the RAW. This document has been prepared in accordance with the CEQA Guidelines [Cal. Code Regs., Title 14, §15164 and §15162].

It should be noted that the analysis provided in this Addendum focuses on potential changes relating to construction activities and does not discuss operation of the new school because the RAW activities would be completed prior to any operation of the proposed replacement school. It should also be noted that JSUSD prepared a Focused EIR to analyze potential impacts specifically related to removal of the existing school building, which is considered a historical structure. The RAW activities would not have any affect on removal of the existing school building and, therefore, this Addendum focuses solely on the analysis conducted in the ISMND.

The CEQA Guidelines [Cal. Code Regs., Title 14, §15162(a)] provides that, for a project covered by a certified EIR or adopted Negative Declaration, preparation of a Subsequent EIR or Negative Declaration rather than an Addendum is required only if one or more of the following conditions occur:

1. *Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;*
2. *Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of the previously identified significant effects; or*
3. *New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time of the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:*
 - a) *The project will have one or more significant effects not discussed in the previous EIR or negative declaration;*
 - b) *Significant effects previously examined will be substantially more severe than shown in the previous EIR or negative declaration;*
 - c) *Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or*
 - d) *Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR or negative declaration would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measures or alternative.*

Cal. Code Regs., Title 14, § 15164(b) of the CEQA Guidelines states:

An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.

Based on the analysis presented herein, DTSC determined that an Addendum to the ISMND is the appropriate CEQA document to address the activities described in the RAW given that none of the conditions described in the CEQA Guidelines [Cal. Code Regs., Title 14, section 15162] calling for the preparation of a Subsequent EIR or Negative Declaration have occurred. This environmental analysis relies on the analyses completed in the ISMND and directly references the ISMND as appropriate.

4. APPLICATION OF PREVIOUS ENVIRONMENTAL DOCUMENTATION TO THE REMOVAL ACTION WORKPLAN:

The ISMND evaluated the potential impacts associated with the proposed development including construction and operation of a new school building and then demolition of the existing school building. With the implementation of the mitigation measures detailed in the Summary of Mitigation Measures identified in the District's ISMND, impacts from the project would not have a significant environmental effect.

As mentioned previously, potential environmental impacts associated specifically with the removal activities described in the RAW were not analyzed in the ISMND and the activities were not included in the project description. The following items are proposed by the JSUSD, in addition to the ISMND, to address the COC at the Site and are discussed in the RAW. In addition, the following text will be considered part of the project description associated with the ISMND:

- The selected remedy for the Carquinez Middle School includes the excavation of lead contaminated soil from five primary areas within the site and transportation of the soils to an off-site landfill location.
- Soil removal using conventional grading and construction equipment and dust suppression, stockpiling, storm water best management practices, and perimeter air monitoring.
- Excavation will be to depths of 1 to 3 feet below ground surface. The total volume of the impacted soils that exceed threshold is estimated to be 96 cubic yards.

As the Responsible Agency for the removal activity, DTSC will approve a RAW to address the COC at the Site. The RAW is incorporated by reference to this Addendum and the ISMND will be expanded to include the details of the discussed removal action.

5. ENVIRONMENTAL IMPACT ANALYSIS:

The ISMND addresses some of the potential impacts from the remedies proposed in the RAW, but it does not completely address the following activities: excavation of lead contaminated soil from five primary areas, stockpile of the excavated soil on-site and testing, and off-site removal of contaminated soil. The RAW activities are confined to the Project, comply with the same regulatory requirements of the Project, and implement the same components in the ISMND that serve to mitigate impacts on the environment. Based on these considerations, there would be no change to the analyses and findings presented in the ISMND for the following impact issue areas: Aesthetics, Agricultural and Forestry Resources, Energy, Geology and Soils, Land Use and Planning, Mineral Resources, Population and Housing, Public Services, Recreation, Utilities and Service Systems. In addition, the RAW activities would have no new impacts associated with: Air Quality and Greenhouse Gas Emissions, Biological Resources, Cultural Resources, Hydrology and Water Quality, Hazards and Hazardous Materials, Noise, Tribal Cultural Resources, and Transportation/Traffic. Therefore, the impacts associated with the RAW for these issue areas would be within the scope of impacts identified in the ISMND, as described below. Applicable mitigation measures from the ISMND are attached as Exhibit A and described below.

AIR QUALITY

ISMND:

Construction Emissions

The Project is located in the San Francisco Bay Area Air Basin (SFBAAB) under the jurisdiction of the Bay Area Air Quality Management District (BAAQMD), which regulates local and regional emission sources. In the SFBAAB, the primary criteria air pollutants of concern include carbon monoxide (CO), ground level ozone formed through reactions of nitrogen oxides (NO_x) and reactive organic gases (ROG), and suspended particulate matter (i.e., respirable particulate matter [PM₁₀] and fine particulate matter [PM_{2.5}]). Construction activities would generate criteria pollutant emissions that could potentially affect regional air quality. The primary pollutant emissions of concern would be ROG, NO_x, PM₁₀, and PM_{2.5} originating from the exhaust of off-road construction equipment and on-road construction vehicles (e.g., worker vehicles, vendor trucks, haul trucks). In addition, fugitive dust emissions of PM₁₀ and PM_{2.5} would be generated by soil disturbance activities.

Estimates of construction emissions were averaged over the total working days and compared to the BAAQMD's thresholds of significance. The project's estimated emissions for ROG, NO_x, and exhaust PM₁₀ and PM_{2.5} were below the applicable thresholds and, therefore, emissions of ROG, NO_x, and exhaust PM₁₀ and PM_{2.5} during project construction would have a less-than-significant impact related to ambient air quality standards. With the implementation of Mitigation Measure AIR-1,

dust control measures (i.e., water all exposed surfaces, cover haul trucks, use wet power vacuum street sweepers, limit vehicle speeds to 15 mph onsite, post publicly visible sign for dust complaints) would be conducted during construction activities of which would sufficiently reduce air quality impacts. Any potential impacts from fugitive dust emissions would be reduced to a less-than-significant level.

Toxic Air Contaminants from Project Construction

Project construction would generate diesel particulate matter (DPM) and PM_{2.5} emissions from off-road diesel construction equipment and on-road vehicles traveling to and from the Site, of which, these emissions could affect nearby sensitive receptors. Based on results of an air dispersion model, potential health risks were evaluated for the maximally exposed individual student (MEIS) located in the existing school building when the proposed building is under construction, and who would move to the newly constructed school building during the demolition of the existing school building. Potential health risks were also evaluated for the maximally exposed individual resident (MEIR) located in a private house on 3rd Avenue, approximately 140 feet west and upwind of the Site. These exposure scenarios represent the most sensitive individuals on and near the Site who could be exposed to the most adverse air quality conditions. Estimated health risks at the MEIS and MEIR from DPM and PM_{2.5} concentrations during construction activities were compared to the BAAQMD's thresholds of significance.

Under the unmitigated construction scenario, the chronic hazard indices were below the BAAQMD's thresholds of significance for both the MEIS and MEIR, and the annual average PM_{2.5} concentrations at the MEIR were below the BAAQMD's threshold of significance. However, the estimated excess cancer risks were above the BAAQMD's thresholds of significance for both the MEIS and MEIR, and the estimated annual average PM_{2.5} concentration was above the threshold of significance for the MEIS. Therefore, the unmitigated emissions of DPM during project construction could result in a potentially significant impact.

With the implementation of mitigation measure AIR-3, the contractor would be required to use off-road equipment equipped with Tier 4 engines as certified by the California Air Resources Board (CARB) during project construction activities. The use of off-road construction equipment with Tier 4 engines would reduce DPM emissions by approximately 96 percent, which would lower the excess cancer risks at the MEIS and MEIR and the annual average PM_{2.5} concentration at the MEIS to below the BAAQMD's thresholds of significance. Any potentially significant impacts from toxic air contaminants would be reduced to a less-than-significant level.

RAW: Currently the BAAQMD maintains emission thresholds for ROG, NO_x, PM₁₀, and PM_{2.5} for construction projects. The proposed removal action is subject to the BAAQMD emission thresholds because it is considered construction. RAW activities would utilize earth moving construction equipment (e.g., backhoe, bulldozer, excavator, shovel) for the completion of soil remediation from five Site locations and will excavate to a depth of up to 3 feet from the excavation areas. Soil transportation will be completed by approximately 6 truckloads following standard dust control measures (e.g., monitoring dust levels at site boundaries, spraying water as a suppressant at and during excavation/loading activities, cover stored soil with tarps or other appropriate materials), as identified in the RAW under the Dust Control Plan. Any potential environmental impacts will be further reduced by compliance with ISMND mitigation measure AIR-1 (see required actions listed above). A 2019 CALEEMOD analysis (Exhibit B) indicates that the emissions associated with RAW activities will not exceed the BAAQMD significance thresholds. Due to the quantity of emissions and the temporary nature of the RAW activities, the removal action is not expected to produce a cumulatively significant impact. Therefore, the activities produced in the RAW would not create any new significant impacts to Air Quality or Greenhouse Gas Emissions and no additional mitigation measures are required.

BIOLOGICAL RESOURCES:

ISMND: The Site is situated within an existing urban context. Biological assessments completed in 2018 identified no special-status plant or animal species have been reported from the Site. Several occurrences of western leatherwood (*Dirca occidentalis*) occur in the canyon to the south of the Site, and numerous other occurrences of special-status animal and plant species occur along the Carquinez Strait and the undeveloped uplands in the surrounding area. Most of the special-status species reported from the Crockett vicinity occur in natural habitats such as coastal salt marsh, riparian woodlands, and forest habitats, all of which are absent from the Site. Suitable habitat for special-status species is absent from the Site, based on a habitat suitability analysis conducted during the field reconnaissance surveys.

However, mature trees on the Site contain suitable nesting substrate for some bird species recognized as Species of Special Concern (SSC) by the CDFW, as well as more common species, and new nests could be established in the future. The MBTA prohibits killing, possessing, or trading in migratory birds, except in accordance with regulations prescribed by the Secretary of the Interior; this prohibition includes whole birds, parts of birds, and bird nests and eggs. Tree removal, building demolition, and other construction activities during the breeding season could result in the incidental loss of fertile eggs or nestlings or nest abandonment. With implementation of mitigation measure BIOLOGY-1, measures would be taken to avoid inadvertent take of raptor nests and other nesting birds (i.e., conduct a focused survey for nesting raptors and other migratory birds, establish an adequate setback around the nest location and restrict construction activities, prepare a report of findings by a qualified biologist). Any potentially significant impacts to nesting birds would be reduced to a less-than-significant level.

RAW: The site remains in similar condition to the environmental analysis reviewed in the 2018 ISMND (Figure 2). Activities associated with the RAW will disturb a much smaller portion of the site than the proposed replacement school. RAW activities will include soil excavation and the use of heavy construction equipment but will not disturb areas that are not otherwise impacted by the school replacement. A 2018 California Natural Diversity Database and Biogeographic Information and Observation System review indicates that no special status or endangered species have been found on Site. However, in light of the possible presence of nesting birds that would be protected under state and federal regulations when the nests are in active use, the RAW activities will not remove vegetation or disturb any habitat. Therefore, construction activities are considered to have a potentially significant impact on nesting birds. With implementation of mitigation measure BIOLOGY-1 (see required actions listed above), any potential impacts to nesting birds would be reduced to a less-than-significant level. Activities proposed in the RAW would not create any new significant impacts to Biological Resources and no additional mitigation measures are required.

CULTURAL RESOURCES:

ISMND: The Site includes one building that was constructed circa 1924 and would be demolished to address seismic safety issues as part of the school replacement. Due to the building's age, the project is expected to result in a potentially significant impact on a built-environment historical resource under CEQA (CEQA Guidelines Section 15064.5). This potentially significant impact was addressed in a Focused EIR prepared for the proposed project. A qualified historian evaluated the building's eligibility for listing in the California Register of Historical Resources (CRHR) and assessed potentially significant impacts on built-environment historical resources in the Focused EIR. The analysis concluded the project would cause a substantial adverse change in the significance of the original school building as defined in California Environmental Quality Act (CEQA) Guidelines Section 15064.4. The Focused EIR recommends implementation of mitigation measure HISTORIC ARCH-1 to document the Carquinez Middle School prior to demolition. However, implementation of this measure would not reduce the impact of the project to a less-than-significant level because the project would materially alter in an adverse manner those physical characteristics of a historic resource that convey the building's historic significance and that justify its inclusion in or eligibility for inclusion in the California Register of Historical Resources. As such, the impact was determined to remain significant and unavoidable after implementation of mitigation measure HISTORIC ARCH-1.

A qualified archaeologist surveyed the project site on November 28, 2017. An open water line excavation leading into the north end of the main building was examined during the survey to inspect the subsurface for archaeological deposits. Isolated, historic-period artifacts were noted on the slope above a service road west of the main building. These artifacts included ceramic tableware fragments, and bottle and window glass that were likely deposited from residences along 3rd Avenue, to the west of and outside the project site. No significant archaeological deposits were observed during the survey.

Based on the results of the records search and map review, there is a potential for intact subsurface pre-contact Native American archaeological deposits on campus. Should such deposits be encountered during project ground disturbance, a substantial adverse change in the significance of a historical resource would occur from its demolition, destruction, relocation, or alteration such that the significance of the resource would be materially impaired (CEQA Guidelines Section 15064.5(b)(1)). With implementation of mitigation measures CULTURAL-1a and -1b measures would be taken to prevent impairment of intact subsurface pre-contact Native American archaeological deposits on the Site (i.e., alert construction contractor(s) overseeing and operating ground-disturbing mechanical equipment to the sensitivity of the Site for buried archaeological deposits, redirect all ground-disturbing activities within 25 feet and contact a qualified archaeologist should

an archaeological deposit be encountered during project subsurface construction activities). Any potentially significant impact on archaeological historical resources would be reduced to a less-than-significant level.

RAW: The site remains in a substantially similar condition to the environmental analysis reviewed in the 2018 ISMND. While the remediation action involves grading and soil disturbance, the RAW activities will be limited to the previously disturbed areas on the Site where cultural resources are unlikely to remain. Any potential RAW environmental impacts will be further reduced by compliance with RAW project controls and implementation of mitigation measures CULTURAL-1a and -1b (see required actions listed above). Therefore, the activities proposed in the RAW would not create any new impacts and no additional mitigation measures are required.

HAZARDS AND HAZARDOUS MATERIALS:

ISMND: Even though the Project itself would not emit hazardous emissions or acutely handle hazardous materials, paints on exterior surfaces of the existing school structures were found to contain elevated levels of lead. Therefore, exposed soils near the existing school structures could contain lead. Based on the potential presence of hazardous materials in project site fill and lead in soils (related to lead-based paint on structures), construction workers and/or the public could be affected by hazardous materials in the project site subsurface.

The ISMND identifies the project is required to comply with existing regulations for school site evaluation and cleanup under DTSC oversight. These regulations would ensure that the project would have a less-than-significant impact related to the potential release of hazardous materials that could be present in the subsurface of the Site.

RAW: The RAW activities involve removing lead in soils on the Site. Five areas were identified as the excavation locations with an approximate total of 96 cubic yards to be removed. Once excavated, contaminated soil will be stored in roll-off bins at the Site and then sampled, classified, profiled, manifested, transported, and disposed of appropriately as hazardous or non-hazardous waste. If disposal of hazardous soils is needed, those soils will be transported to a Class I landfill. If disposal of non-hazardous soils is needed, those soils may be transported to a Class II landfill, or to a Class III landfill to be recycled for alternate daily cover.

The RAW soil removal activities will implement following procedures to control the generation of airborne dusts thereby reducing exposure of nearby sensitive receptors and the adjacent community to contaminants.

- 1) monitoring dust levels by a Site air-monitoring professional who has have the authority to stop-work in the event of that on-site activities generate dust levels in excess of the on-site (5.0 mg/m^3) or community/fence line (0.05 mg/m^3) action levels;
- 2) spraying water prior to daily work activities, during excavation/loading activities (as necessary to maintain concentrations below action levels), and at truck staging locations. Watering equipment will be continuously available to provide proper dust control;
- 3) Avoiding the generation of dust clouds with opacity greater than 20-percent in accordance with BAAQMD regulations;
- 4) suspending earth moving operations when wind speeds are large enough to result in visible dust emissions from the point-of-origin or crossing the Site boundary, despite the application of dust mitigation measures; and
- 5) Measuring airborne dust levels using real-time, data-logging aerosol monitors.

Therefore, the activities proposed in the RAW would not create any new significant impacts related to hazards and additional mitigation measures are not required.

HYDROLOGY:

ISMND: The Edwards Creek culvert was constructed prior to 1933, and a portion of the culvert collapsed beneath the playground of the Site in 1999. The age and documented collapse of this culvert raise concerns regarding the structural integrity of the culvert. The proposed project would involve the use of heavy construction equipment and construction of new pavement surfaces in areas overlying the Edwards Creek culvert.

Construction activities have the potential to damage the Edwards Creek culvert, which could result in flooding of the Site and adjacent areas as flows through the culvert could be restricted or blocked if the culvert is damaged. However, with the implementation of mitigation measure HYDROLOGY-1 measures would be taken to prevent damaging the Edwards Creek

culvert which could result in flooding of the project site and adjacent areas (i.e., evaluation by a qualified licensed engineer of the current condition of the Edwards Creek culvert and its susceptibility to damage from the proposed construction activities). Any potentially significant impact on hydrology would be reduced to a less-than-significant level.

RAW: RAW activities will utilize similar construction equipment for the completion of soil remediation. On-site use of heavy equipment for excavation would have the same potential to damage the Edwards Creek culvert thereby resulting in flooding of the Site and adjacent areas. Any RAW impact will be reduced to a less-than-significant level with compliance to the ISMND's mitigation measure HYDROLOGY-1 (see required actions listed above). Therefore, the activities proposed in the RAW would not create any new impacts, and no additional mitigation measures are required.

NOISE:

ISMND: Noise generated from the use of heavy machinery during the construction phase of the Project may temporarily but noticeably increase noise and groundborne vibration over current ambient conditions. However, with the implementation of mitigation measures NOISE-1a through NOISE-1d and NOISE-2a through NOISE-2b, measures would be taken to prevent construction activities from exposing persons to or generating excessive groundborne vibration levels (i.e., limit hours of construction equipment operation; prevent the use of earth-moving construction equipment during established class testing periods; develop and implement a set of procedures for tracking and responding to complaints received pertaining to construction vibration and noise; post informational notices on the fence line of the construction site, nearby buildings, and classrooms; require use of additional noise-reducing measures to reduce temporary increase in ambient noise levels in vicinity of the Site). Any potentially significant impact from noise would be reduced to a less than significant level.

RAW: RAW activities will utilize similar construction equipment for the completion of soil remediation. On-site use of heavy equipment for excavation is expected to increase ambient noise and groundborne vibration but will not permanently exceed ambient conditions. Any noise impact from RAW activities will be temporary and further reduced by compliance to the ISMND's mitigation measures NOISE-1a through NOISE-1d and NOISE-2a through NOISE-2b (see required actions listed above). In addition, earth-moving activities will be performed only between the hours of 7:30 a.m. and 6 p.m. Monday through Friday and also on weekends or holidays between the hours of 9:00 a.m. through 5:00 p.m. Similarly, earth-moving activities (i.e., grading, excavation, backfill) will be limited to between the hours 7:30 a.m. and 5:30 p.m. on weekdays. Lastly, equipment engine shrouds will be closed during equipment operation and when not in use, motorized construction equipment will not be left idling. With implementation of these noise control measures, the activities proposed in the RAW would not create any new impacts, and no additional mitigation measures are required.

TRANSPORTATION/TRAFFIC:

ISMND: Pomona Street and Crockett Boulevard are currently adjacent to the Site and facilitate circulation. The increase in traffic that would result from project construction activities were quantified assuming a worst-case single-phase construction period of 24 months. The analysis assumed construction of the entire project in one phase to identify the potential worst-case traffic effects. If the project is built in phases over time, the effects of each phase would be the same or less. Each phase would be subject to a Construction Traffic Control Plan (as required by mitigation measure TRAFFIC-1) and oversight by the Contra Costa County Engineer. The last phase may require added worker parking measures, depending on the circumstances, as there would not be any remaining vacant land for parking.

Approximately six pieces of heavy equipment would be transported on and off the Site each month throughout the construction of the proposed project. Heavy equipment transport to and from the Site could cause traffic impacts in the vicinity of the Site during construction. However, each load would be required to obtain all necessary permits. In addition, impacts from hauling eight loads of heavy equipment to and from the Site each month would be short-term and temporary.

The weekday work is expected to begin around 7:30 AM and end no later than 6:00 PM. Most construction would be completed during the weekdays around 4:00 PM. The construction worker arrival peak would occur between 6:30 AM and 7:30 AM, and the departure peak would occur between 4:00 PM and 5:00 PM. It should be noted that the number of trips generated during construction would be temporary and are also expected to be less than the proposed project trip generation at buildout. Based on past construction of similar projects, construction workers could require parking for up to 40 vehicles during the peak construction period. Additionally, deliveries, visits, and other activities may generate peak non-

worker parking demand of 10 to 20 trucks and automobiles per day. Therefore, up to 60 vehicle parking spaces may be required during the peak construction period just for the construction employees.

The project would require the importation of construction material, including raw materials for the building pads, the buildings, the parking areas, and landscaping. With implementation of Mitigation Measure TRAFFIC-1, measures would be taken to require the preparation of a Traffic Control Plan. Any potentially significant impact from traffic would be reduced to a less-than-significant level.

RAW: Due to the short-term and temporary nature of the remediation action, RAW activities are not anticipated to significantly increase local traffic or regional traffic. Approximately 6 total truck trips over an approximate 2-week period, or (1 truck trip per day) will be routed for the transportation of contaminated soil along arterial roads (e.g., Crockett Boulevard, Pomona Street) and interstate highways (e.g., Interstate 80). Because the RAW activities are significantly smaller than those analyzed in the 2018 ISMND, and the truck route is along an arterial and an interstate highway, any impacts from RAW activities will be less than significant and will be further reduced by compliance with the RAW Transportation Plan for Off-Site Disposal and mitigation measure TRAFFIC-1 (see required actions listed above). Due to the small quantity of truck trips, close proximity to an interstate (less than ½ mile), and the temporary nature of the RAW activities, the remediation action would not create any new impacts, and no additional mitigation measures are required.

6. CONCLUSION:

Activities proposed in the RAW would not alter the significance levels nor mitigation measures for Air Quality, Biological Resources, Cultural Resources, Hazards and Hazardous Materials, Hydrology, Noise, or Transportation/Traffic, as presented in the ISMND. Further, there will not be any new significant impacts or a substantial increase in the severity of impacts as compared to the issues identified in the ISMND. No additional mitigation measures are required for the RAW activities. Therefore, the impacts for the RAW are within the scope of impacts identified in the ISMND, and the ISMND adequately addressed all impacts of the project.

Based on the above, DTSC finds that an Addendum to the previously adopted ISMND is the appropriate CEQA document for the RAW activities pursuant to the CEQA Guidelines [Cal. Code Regs., Title 14, § 15164(b)] because none of the conditions described in the CEQA Guidelines [Cal. Code Regs., Title 14, §15162] apply. This Addendum has appropriately disclosed the potential impacts from the RAW activities and will be included as part of the CEQA record for the RAW. A Notice of Determination for this Addendum to the ISMND will be filed with the California State Clearinghouse within the State of California Office of Planning and Research.

CERTIFICATION

I hereby certify that the statements furnished above present the data and information required for this evaluation to the best of my ability and that the facts, statements, and information presented are true and correct to the best of my knowledge and belief.



DTSC Project Manager Signature

8/13/2021

Date

Elizabeth Tisdale

Name

Engineering Geologist

Title

916-255-6666

Telephone/Email Address



DTSC Branch Chief Signature

8/13/2021

Date

for Dan Ziarkowski

Name

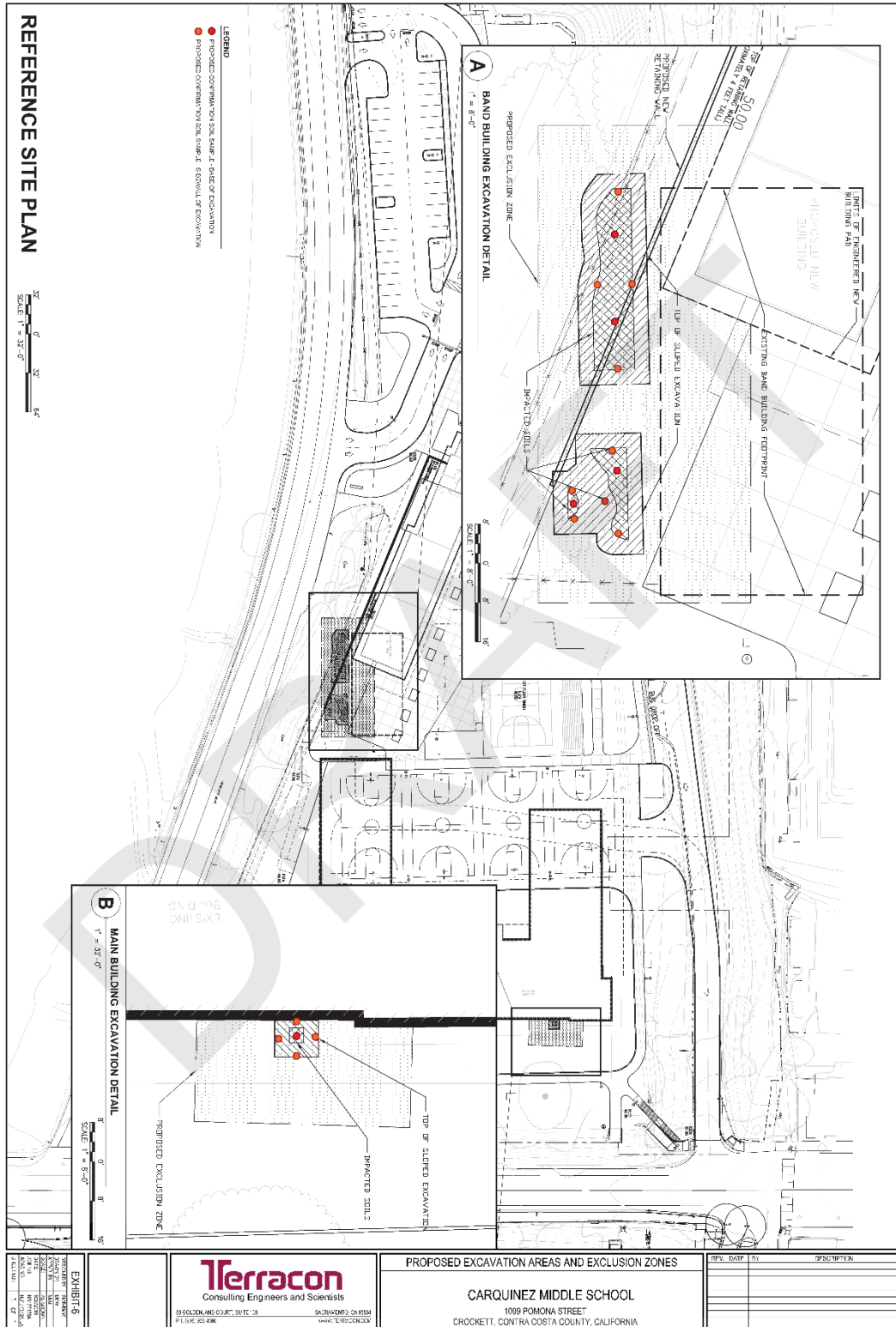
Branch Chief

Title

916-255-3732

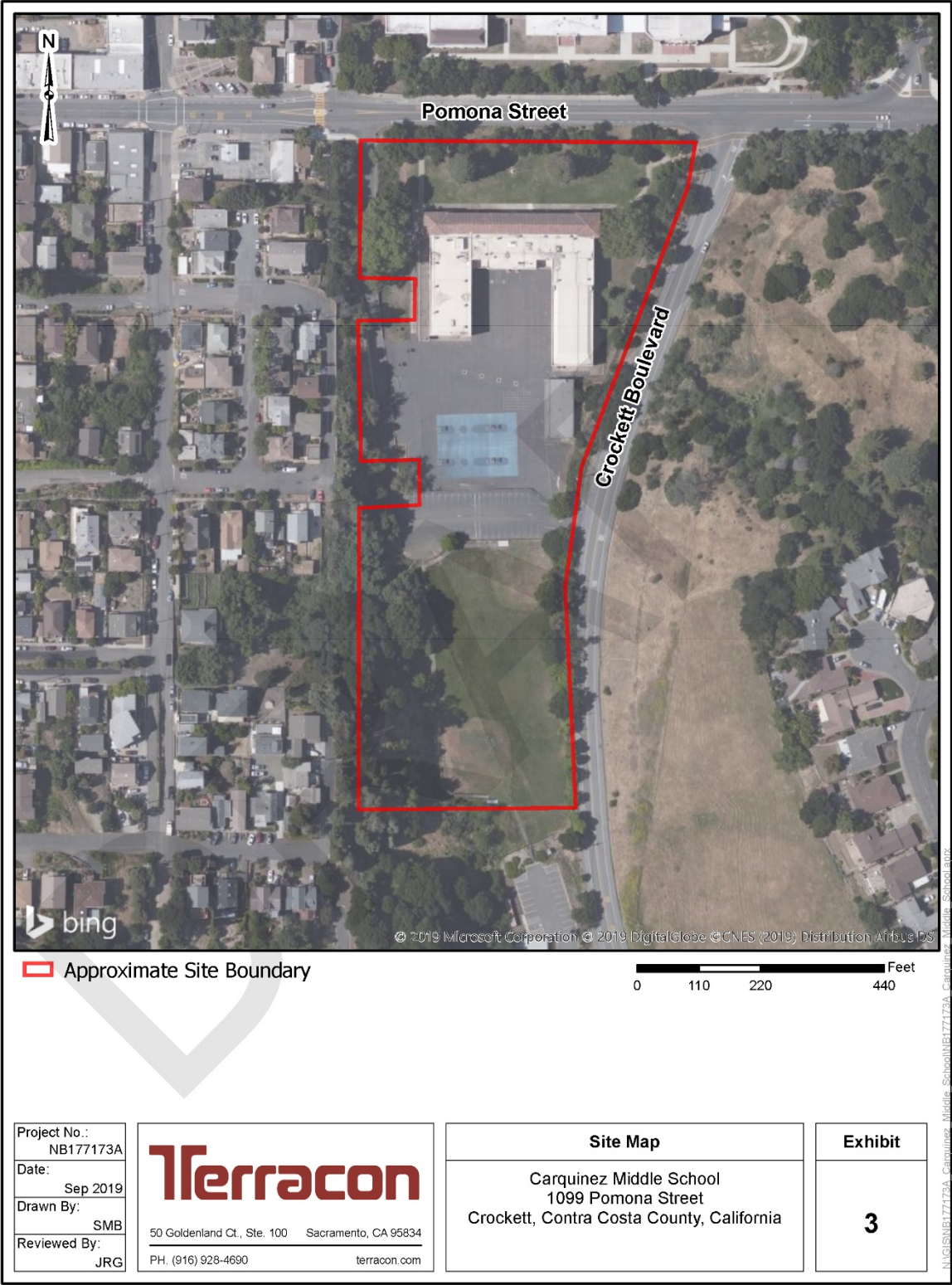
Telephone/Email Address

Figure 1 – Proposed Excavation Areas



Source: 2018 IS/MND

Figure 2 – Current Site Conditions



Source: 2018 IS/MND

